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August 30, 2022

Mr. Ryan Hancharick
Water Division
US EPA Region 3
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

Dear Mr. Hancharick,

I am writing in opposition to the draft permit (PAS2D702BALL) issued to Penneco Environmental Services authorizing the conversion and operation of an Underground Injection Control (UIC) Class IID commercial disposal injection well in Plum Borough, Allegheny County. It is my understanding that the permit would allow Penneco to inject drilling wastewater and other fluids from their oil and gas drilling operations into the Murrys ville sandstone formation in the subsurface perforated interval between approximately 1,740 feet to 1,800 feet below ground surface over the next ten years.

As oil and gas companies like Penneco continue to find more ways to extract our natural resources using dangerous chemicals, the management of their toxic byproducts is becoming increasingly dangerous. [According to Food & Water Watch](#), since the 1980s, oil and gas operators have injected more than 33 trillion gallons of wastewater underground – posing serious and significant threats to our communities, our families, our environment, and our groundwater.

A 2017 public comment submission drafted by Food & Water Watch regarding the permit for the first injection well on this same site indicated that Pennsylvania DEP records indicate at least 40 gas wells exist currently in Plum Borough, including the five identified by EPA as within 1,000 feet of the injection site. Their review of Pennsylvania DEP records found that Penneco committed over 50 violations in operating oil and gas wells in Pennsylvania. Some of these violations are significant and include failing to properly control and dispose of industrial and residual wastes resulting in water contamination. Just last year, [there was a violation at their Sadat 3A](#) well in Plum Borough for failing to notify the PA Department of Environmental Protection within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution. And in August 2020, that same well was [issued five violations](#) regarding environmental health and safety.

Additionally, [a 2014 study by the Government Accountability Office](#) indicated that while the EPA does implement safeguards in the process, the safeguards do not address emerging underground injection risks, such as seismic activity and overly high pressure in geologic formations leading to surface outbreaks of fluids. The report also cites that every day in the United States, at least 2 billion gallons of fluids are injected into over 172,000 wells to enhance oil and gas production, or to dispose of fluids brought to the surface during the extraction

of oil and gas resources. Injection wells raise serious concerns about the safety of the nation's drinking water – particularly in areas, like Plum Borough, with other drilling operations.

Under Pennsylvania's Act 13 of 2012, chemical compounds used in fracking operations have limited disclosure requirements. However, the full picture of the chemicals used is often hidden from view due to provisions that exempt access to chemical information deemed to be "confidential proprietary information" or "trade secrets." Fracking companies have argued full disclosure would undermine their proprietary advantages and stifle the competitive nature of their operations. A [2018 report by Partnership for Policy Integrity \(PFPI\) entitled KeyStone Secrets](#), found that between 2013 and 2017, companies in Pennsylvania injected secret fracking chemicals 13,632 times into a total of 2,515 wells.

As we have seen in the years since fracking began in Pennsylvania, the use of hazardous chemicals has led to significant public health issues and the deterioration of drinking water quality in every community where these operations take place. If Penneco and other oil and gas companies are not required to disclose all of the chemicals used in their process, how then can they attest to the safety of injecting these hazardous and toxic chemicals back into the ground? A new geospatial analysis, the interactive [Oil and Gas Threat Map](#), which shows all active oil or gas wells nationwide, concludes that 1,482,810 Pennsylvanians, including 290,123 children, reside or attend schools or daycares within a half-mile "threat radius" of active oil and gas operations.

Everyone deserves clean water to drink. But across the country and across our Commonwealth, the drinking water of millions of Americans is being contaminated by the oil and gas industry. Plum Borough Council has been actively trying to prevent the second injection well from moving forward and filed an appeal earlier this year against its own zoning board, which approved the Penneco application in January. Residents who live near the current injection well said they do not want a second injection well near their homes because it will continue to increase concerns about possible impacts on drinking water, air quality, truck traffic and noise.

The oil and gas drilling industry in Pennsylvania has ruined the lives of so many Pennsylvania families and has caused irreparable damages to our environment. The toxic legacy of this industry will be felt for generations and by permitting another injection well in Allegheny County, we are exacerbating the issue. Both the Environmental Protection Agency and the Pennsylvania Department of Environmental Protection explicitly state 'environmental protection' in their names, but permitting dangerous wastewater disposal injection wells prioritizes industry over environment.

I am asking the US Environmental Protection Agency to be a part of the solution and to improve testing procedures, strengthen enforcement of rules and regulations, and require disclosure of all chemicals used in the cradle-to-grave process. I strongly encourage the EPA to listen to the impacted residents and the families of Plum Borough and to refuse this permit to Penneco for this dangerous commercial disposal injection well.

Thank you in advance for your attention to these important matters of public health.

In service,

Non-responsive based on revised scope.
Non-responsive based on revised scope.
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Katie Muth
State Senator
44th Senatorial District